

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JORGE IVAN VALENCIA OSORNO,

Petitioner,

v.

PATRICIA HYDE, Field Office Director,
MICHAEL KROL, HIS New England Special
Agent in Charge,
TODD LYONS, Acting Director U.S.
Immigrations and Customs Enforcement, and
KRISTI NOWM, U.S. Secretary of Homeland
Security,

Respondents.

Civil Action No. 1:25-CV-11592-NMG

**JOINT MOTION OF THE PARTIES FOR RECONSIDERATION
OF THE COURT'S ORDER (Docket No. 7)**

The Parties, by and through their attorneys, herein file this Joint Motion for Reconsideration of the Court's Order (Docket No. 7) setting the date of June 16, 2025, for Respondents to respond to the Petition. As grounds for this motion the Parties state as follows:

1. Counsel for their respective parties have known each other for years as members of the Massachusetts bar and take their roles and responsibilities extremely seriously. As a result, over the years they have worked well together to identify when resolutions can be reached regarding the various cases they have handled.
2. Regarding this case, counsel for the Parties initially spoke upon the filing of this habeas petition and identified a path for avoiding unnecessary litigation, and thus simultaneously saving judicial resources.
3. Since the habeas petition was filed, as of today the Petitioner has been returned to Massachusetts and is currently detained at the Plymouth County House of Corrections. Also,

Motion allowed. JKM/Gorton, USDJ 06/16/2025